

**UNITED STATES BANKRUPTCY COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Joseph Colucci	:	Chapter 13
	:	
<u>Debtor</u>	:	
Freedom Mortgage Corporation	:	
Movant	:	Bankruptcy Case Number
	:	19-16972 AMC
	:	
v.	:	
	:	
Joseph Colucci	:	
	:	
Respondent/Debtor	:	
	:	

**Debtor's Response to the Motion of Freedom Mortgage Corporation
for Relief from the Automatic Stay**

Debtor, **Joseph Colucci**, by and through his counsel, **MICHAEL SCHWARTZ, ESQUIRE**, hereby files this response to the Motion for Freedom Mortgage Corporation and in support thereof avers as follows:

1. ADMITTED.
2. ADMITTED.
3. ADMITTED.
4. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.
5. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant. By way of further response, Debtor has made payments not credited within the motion.

6. DENIED. By way of further response, the payment history does not include payments made in the month of January 2024.

7. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.

8. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.

9. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.

10. No Response Required.

11. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.

12. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.

WHEREFORE, Debtor, **Joseph Colucci**, requests this Honorable Court deny the motion of Freedom Mortgage Corporation for relief from automatic stay and to declare the automatic stay is still in effect.

Respectfully Submitted,

\s\ Michael Schwartz
MICHAEL SCHWARTZ, ESQUIRE
Attorney for Debtor